

Presentment Date and Time: October 8, 2015, at 10:00 a.m.
Objection Date and Time: October 7, 2015, at 12:00 p.m.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

LEHMAN BROTHERS HOLDINGS INC., et al.,

Debtors.

Chapter 11
Case No. 08-13555 (SCC)

**NOTICE OF PRESENTMENT OF
[PROPOSED] FIRST AMENDED
SCHEDULING ORDER AND DISCOVERY PLAN**

PLEASE TAKE NOTICE that the undersigned will present the annexed [*Proposed*]
First Amended Scheduling Order and Discovery Plan (the “Proposed Order”) to the Honorable
Shelley C. Chapman, United States Bankruptcy Judge, for signature on **October 8, 2015, at**
10:00 a.m. (prevailing Eastern time).

PLEASE TAKE FURTHER NOTICE that responses or objections, if any, to the
Proposed Order must be in writing, must conform to the Federal Rules of Bankruptcy Procedure,
the Local Rules of the Bankruptcy Court for the Southern District of New York, and all other
applicable rules and orders, must set forth the name of the objecting party, the basis for the
objection and the specific grounds therefore, and must be filed with the Bankruptcy Court by
October 7, 2015, at 12:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”)
electronically in accordance with General Order M-399 by registered users of the Bankruptcy
Court’s case filing system, and by all other parties in interest on a 3.5 inch disk, preferably in
Portable Document Format (PDF/A), WordPerfect, or any other Windows-based word

processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-399, and any objection must further be served upon the following persons, so as to be actually received no later than the Objection Deadline: (i) Wachtell, Lipton, Rosen & Katz, 51 West 52nd Street, New York, New York, 10019, Attn. Harold S. Novikoff and Ian Boczko; (ii) Quinn Emanuel Urquhart & Sullivan, LLP, 51 Madison Avenue, New York, New York 10010, Attn. Tyler G. Whitmer; (iii) Curtis, Mallet-Prevost, Colt & Mosle LLP, 101 Park Avenue, New York, New York, 10179, Attn. Peter J. Behmke; (iv) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004, Attn. Andy Velez-Rivera, Esq., Paul Schwartzberg, Esq., Brian Masumoto, Esq., Linda Riffkin, Esq., and Tracy Hope Davis; Esq.; and (v) any other person or entity entitled to service. Unless responses or objections are timely filed, served, and received in accordance with this paragraph, the Proposed Order may be signed and entered without a hearing.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed, a hearing will be held at the next omnibus hearing date scheduled in these cases. The moving and objecting parties are required to attend the hearing, and failure to appear may result in relief being granted or denied upon default.

DATED: September 30, 2015

WACHTELL, LIPTON, ROSEN & KATZ

By /s/ Harold S. Novikoff
Harold S. Novikoff
Ian Boczko
Luke M. Appling
Aline R. Flodr
Mohit Gourisaria
Counsel for JPMorgan